



EST. 1963

CREST  
NICHOLSON

SPEAKING

UP

OUR WHISTLEBLOWING POLICY AND A GUIDE TO HELP  
YOU SPEAK UP AND REPORT ANY CONCERNS AT WORK.

# INTRODUCTION

## A message from our Chief Executive Officer

### Dear Colleagues

We strive to provide a place where we are all proud to work. Behaving in accordance with our culture and values is essential for our success. This means acting honestly and treating each other and our customers, partners and supply chain, fairly and with respect. However, we acknowledge that all businesses face the risk of things going wrong from time to time, or that concealed malpractice, illegal or unethical conduct may be taking place. We want to maintain an open and honest culture where all those who work for us know they can ask a question, raise an issue, or challenge something and expect to be listened to.

Please speak up if you are concerned about anything. If you raise a genuine concern at work, you can be confident you will be treated with respect and we will investigate the matter and take action where necessary.

Speaking up will help us be safer and perform better. Please take time to read this guide and understand how you can raise a concern.



**Martyn Clark**

Chief Executive Officer

# Speaking up

**Speaking up, sometimes called whistleblowing, is the reporting of actual or suspected wrongdoing or danger in relation to our activities.**

Some examples of activities that would cause you to raise a concern:

- **Health and safety risks**
- **Criminal activity such as theft, fraud, tax evasion and bribery**
- **Damage to the environment**
- **Discrimination and harassment**
- **Breach of legal or professional obligations**
- **Breach of our internal policies and procedures**
- **Conduct likely to cause damage to our reputation or financial wellbeing**
- **Unauthorised disclosure of financial information**
- **The deliberate concealment of any of the above matters**

Anyone who works for Crest Nicholson, whether an employee, subcontractor, casual worker or agency worker, has the right to Speak Up and is encouraged to do so. We also want to hear from customers and members of the public who have concerns related to our business.

This policy is not intended to be used for complaints or concerns relating to your own personal circumstances. Please raise such matters under the Grievance Policy.



# How do I report a concern?

**If you are a Crest employee:**

You should report your concern to your line manager or, if that is not appropriate, to a more senior manager within Crest Nicholson. You can also report to the Chief People Officer and/or the Group Company Secretary (see contact details at the end of this guide). Alternatively, you can use the confidential 24/7 hotline shown below.

**If you don't work within our business:**

You can contact the Group Company Secretary (see contact details at the end of this guide). Alternatively, you can use the confidential 24/7 hotline shown below.

**0800 068 9449**  
**or via [crestnicholson.ethicspoint.com](https://crestnicholson.ethicspoint.com)**

This hotline, run by Navex Global, is a free, confidential telephone and online service that enables employees, supply chain partners and members of the public to report concerns related to our business. The website is able to receive reports in languages other than English.



The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely, if ever, be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Protect, operates a confidential helpline.

They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this booklet.

# What information should I include when reporting a concern?

**It is really important that you provide us with as much information as possible, so we are able to investigate the matter.**

Failure to provide appropriate detail may prevent us from being able to investigate.

Wherever possible, you should provide the following:

- **Description of the event.** You should include the date of the event, location, how you became aware of the issue being reported and supporting evidence, if you have it. It is not necessary for you to have gathered evidence or proof, provided you have a genuine concern.
- **Name and position of people involved.** You should outline those who had knowledge of the issue being reported and names of anyone or organisation aware.
- **Policy or regulatory deviation.** If relevant, what breach of policy or regulation happened that caused you to report this concern?
- **Impact.** If relevant, actual or potential impact to us i.e. costs involved or impact on our public reputation.

If you are using the Navex hotline, we encourage you to provide your name, your position and contact details, so we can get in touch with you and request further information where required.

You can report your concern anonymously if you prefer, but this may limit our ability to investigate and we will not provide feedback on any investigation carried out.

We will keep your identity confidential unless disclosure is required by law or consent is given by you.

## What will happen next?

**Once a concern has been raised through one of these channels, the Chief People Officer and Group Company Secretary will review the case. Following their review, the Group People team will either investigate the allegations themselves, or refer the matter to others for investigation.**

On raising a concern (if not anonymous) we may ask you for more information or for a meeting to discuss your concerns. You may bring a colleague or trade union representative to any meeting held under this policy. Your companion must maintain the confidentiality of the whistleblowing concern and any subsequent investigation.

**We will let you know:**

- How and by who the concern will be handled
- How long the investigation will take
- That you are entitled to independent advice

We will endeavour to keep you informed of the progress of the investigation, and you must treat any information about the investigation as confidential. In some cases the need for confidentiality will prevent us from giving you specific details of the investigation, outcome or any action taken as a result of your whistleblowing concern.

If, having reported a matter, you do not believe that it is being appropriately dealt with, you should follow the Group's grievance procedure contained within the Grievance Policy.

# How am I protected from retaliation?

**We actively promote a culture of openness and will support those who raise genuine whistleblowing concerns under this policy, even if they turn out to be mistaken.**

We do not tolerate retaliation against those who raise genuine whistleblowing concerns. All concerns will be treated fairly and if the concern you raised has been made honestly, even if not confirmed by subsequent investigation, no action will be taken against you. Any individual who threatens or retaliates against a whistleblower in any way will be subject to disciplinary action under the Disciplinary Policy.

If you consider that you are being subjected to detrimental treatment you should inform the Group Company Secretary. If the matter is not remedied you should raise it formally under the Grievance Policy.

However, those who make false allegations maliciously or with a view to personal gain may be subject to disciplinary action under the Disciplinary Policy.

If you Speak Up and report issues of concern that are in the public interest, you have a legal right under the Public Interest Disclosure Act 1988 to be protected from harassment, victimisation, dismissal or any other reprisal or detriment as a result of reporting your concern, unless it is later proved that the information provided was false to your knowledge. You can find more information about this on the Protect website – their details are at the end of this booklet.



# Where can I get more information or support?

**We understand that Speaking Up can be hard and that you may have to make a difficult decision.**

If you want more information, or you have any questions about Speaking Up please contact:



**Sue Wishart**  
Chief People Officer  
Sue.Wishart@crestnicholson.com  
07384 242379



**Penny Thomas**  
Group Company Secretary  
Penny.Thomas@crestnicholson.com  
07977 851249

To support our employees we have a dedicated Employee Assistance Programme run by an external service provider Health Assured. Health Assured provide a free and confidential counselling service and can also provide legal support in reporting a serious concern. You can call their free 24-hour helpline on 0800 030 5182 or visit their website at [wisdom.healthassured.org](http://wisdom.healthassured.org). Further information is available on Grapevine.



You can get more information and advice by visiting the website of the registered charity Protect at [protect-advice.org.uk](http://protect-advice.org.uk) or by calling them on 020 3117 2520.



**This policy does not form part of any employee's contract of employment and we may amend it at any time.**

The Board of Crest Nicholson Holdings plc has approved this policy. The Audit and Risk Committee of Crest Nicholson Holdings plc has oversight of the operation of this policy and receives reports on any concerns raised.

If you are unable to raise an issue within Crest Nicholson, you should contact our hotline 24/7 on: **0800 068 9449 or via [crestnicholson.ethicspoint.com](http://crestnicholson.ethicspoint.com)**